Appendix 5.12-A

USCG Correspondence

U.S. Department of Transportation
United States Coast Guard

Commanding Officer
U. S. Coast Guard
Marine Safety Office

20 Risho Ave.
East Providence, RI 02914-1208
Phone: (401) 435-2330
FAX: (401) 435-2399

16670
February 10, 2003

Karen K. Adams
Chief, Permits and Enforcement Section
Department of the Army
Corps of Engineers – New England District
696 Virginia Road
Concord, MA 01742-2751

Dear Ms. Adams:

Enclosed are a variety of analyses that we are requiring to be included in the Environmental Impact Statement (EIS) for the Cape Wind Energy Project in Nantucket Sound. We have included analysis requirements regarding the project's potential impact on navigational safety and also on search and rescue operations, communications, radar, and positioning systems. In addition to these analyses, any structures built will be required to meet Coast Guard regulations for marking as private aids to navigation.

We are prepared to review and comment on the completed assessments and on other marine navigation related information associated with the preparation of the EIS. We are not, however, in a position to undertake data collection, conduct EIS analyses, or prepare sections of the draft or final EIS as staff and resources are fully tasked in other obligatory programs. However, we understand that the Coast Guard will be the source agency for some of the data required for the assessments and we will provide the data under routine methods upon request of the developer.

We recommend that you forward sections 2 and 3 of the enclosure to the Federal Aviation Administration and section 3 to the Federal Communications Commission as these areas of concern are also within their purview.

If you have any questions, please contact the Coast Guard project POC, Mr. Peter Popko at (401) 435-2380 or ppopko@msoprov.uscg.mil.

Sincerely,

Mary E. Landry
Captain, U.S. Coast Guard
Captain of the Port

Enclosure: Cape Wind – Nantucket Sound - Assessment Elements

CAPE WIND – NANTUCKET SOUND – Assessment Elements

1. Navigational Safety:

The Cape Wind – Nantucket Sound project developers must conduct a navigational safety risk assessment as part of the Environmental Impact Statement. The assessment must include, but is not limited to, the following elements:

a. A marine traffic survey in proximity to the proposed locations that includes:

- Types, sizes, and drafts of vessels.
- Typical routes.
- Density of traffic.
- Seasonal variances in traffic.
- Marine events.

b. An analysis of expected weather conditions, current directions/velocities, water depths and sea states that might aggravate or mitigate the likelihood of collision with the towers and navigational safety in general.

c. An evaluation of the risk of collision between vessels and the towers that includes:

- Likely frequency of collision.
- Likely consequences of collision ("What- If" analysis).
- The ability of a tower to withstand collision damage without toppling for a range of vessel speeds and vessel sizes.

d. An analysis of any likely changes in vessel movements resulting from the installations.

e. An analysis of any constraints imposed by the installations upon local navigation and anchoring.

f. An analysis of any increased danger of vessels colliding with each other or grounding due to the installations.

g. An analysis of the likelihood of floating ice build-up around and between the towers, and its possible impact on vessel navigation.

h. An analysis and discussion of the impact on the ability of all classes of vessels to anchor within the vicinity of the tower field.

2. Search & Rescue

Coast Guard opinion: Searches for small vessels or people in the water (PIW) and smaller search objects will be particularly affected due to the higher helicopter and fixed wing search altitudes required. The probability of detecting these targets will be decreased due to the presence of the wind farm. Additionally, the presence of the towers and their rotating blades will significantly diminish the ability to hoist victims by helicopter in the area of the wind farm.

To gauge the potential extent of impact on search and rescue operations, the Cape Wind – Nantucket Sound project developers must conduct an assessment that includes, but is not limited to, the following elements:

a. How many search and rescue cases has the CG conducted in the Horseshoe Shoals region over the last ten years?

b. How many of these cases involved helicopter hoists?

c. How many were at night or in poor visibility/low ceiling?

d. How many of these cases involved helicopter searches?

e. How many times have commercial salvors (e.g., BOAT US, SEATOW, commercial tugs) responded to assist vessels in the Horseshoe Shoals region over the last ten years?

f. How many were at night or in poor visibility?

g. What number of additional SAR cases is projected due to allisions with the towers?

3. Communications, Radar and Positioning Systems:

To gauge the potential extent of impact on communications, radar and positioning systems, the Cape Wind – Nantucket Sound project developers must provide researched opinion concerning whether or not:

a. The generators and their mountings could produce radio interference such as reflections or phase changes, with respect to any frequencies used for marine positioning, navigation or communications, including VHF radio, Radio Direction Finding equipment, and Automatic Identification Systems.

b. The generators could produce radar reflections, blind spots or shadow areas:

- Vessel to vessel.
- Vessel to shore.
- Racon (radar beacon) to / from vessel.

c. The generators, in general, would comply with current recommendations concerning electromagnetic interference.

d. The site might produce acoustic noise that could mask prescribed navigational sound signals.

e. The generators and the seabed cabling might produce magnetic fields affecting compasses and other navigation systems.